

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

LYNN PITTS,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:22-cv-00819
)	
WASATCH MEDICAL GROUP, LLC,)	
and ANDREW RINEHART,)	
)	
Defendants.)	

**DEFENDANT ANDREW RINEHART’S MOTION TO DISMISS FOR LACK OF
PERSONAL JURISDICTION AND FOR FAILURE TO STATE A CLAIM UPON
WHICH RELIEF CAN BE GRANTED**

Defendant Andrew Rinehart (“Rinehart”) hereby moves to dismiss this action for lack of personal jurisdiction, pursuant to Fed. R. Civ. P. 12(b)(2), and for failure to state a claim upon which relief can be granted, pursuant to Fed. R. Civ. P. 12(b)(6). In so moving and as discussed further in the Suggestions in Support submitted contemporaneously herewith and incorporated herein by reference, Rinehart respectfully states that Rinehart lacks sufficient minimum contacts with the State of Missouri to warrant the valid exercise of general or specific jurisdiction in this matter and that Plaintiff’s Complaint fails to allege sufficient facts to state a claim against Rinehart upon which relief can be granted. As such, dismissal is warranted pursuant to Fed. R. Civ. P. 12(b)(2) and Fed. R. Civ. P. 12(b)(6).

WHEREFORE, Defendant Andrew Rinehart requests that this Court dismiss all claims asserted against him in Plaintiff’s Complaint pursuant to Fed. R. Civ. P. 12(b)(2) and Fed. R. Civ. P. 12(b)(6), and for any such further relief as the Court deems just and proper.

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/s/


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Attorneys for Defendant Andrew Rinehart

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was served this 8th day of May, 2023, via the Court's Electronic Filing System upon all counsel of record herein.

/s/

